

EXHIBIT A
Affidavit of Anthony Clark

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

AL EVERITT BOYETT, JR.,)
)
Plaintiff,)
)
v.) CIVIL ACTION NO.: 2:05-CV-966-D
)
ANTHONY CLARK, SHERIFF, *et al.*,)
)
Defendants.)

AFFIDAVIT OF ANTHONY CLARK

STATE OF ALABAMA)
)
COUNTY OF COVINGTON)

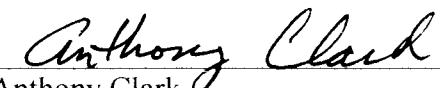
1. My name is Anthony Clark. I am over the age of nineteen and am competent to execute this affidavit, which is based on my personal knowledge, training and experience.
2. I am the duly-elected Sheriff of Covington County, Alabama and was the duly-elected Sheriff of Covington County at all times relevant to Plaintiff's Complaint.
3. I am not a trained health care professional, and have no means of determining what is appropriate medical care for any disease. I rely on Southern Health Care to provide me with sufficient information to provide appropriate and adequate health care to inmates in the jail.
4. To my knowledge, Southern Health Care has not informed me that the Plaintiff in this action requires any particular or specialized treatment or health care.
5. It is the policy of the Covington County Sheriff's Department that inmates who are readily identifiable as having communicable diseases, or who require medical treatment beyond what the Covington County Jail can provide, are transferred as soon as possible into the custody of an Alabama State correctional institution.

6. The Covington County Sheriff's Office has attempted, on many occasions, to transfer inmates to the State, only to have them refused. At any given time, the Covington County Jail currently has approximately fifty (50) State inmates waiting to be accepted by the State Department of Corrections.

7. I do not make and have never made a decision regarding provision of medical services to an inmate based on expense.

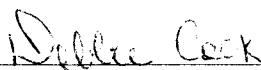
8. I certify and state that the documents provided to the Court which are attached to the Defendants' Supplemental Special Report are true and correct copies of the records kept at the Covington County Jail and Covington County Sheriff's Office in the regular course of business.

9. I affirm, to the best of my present knowledge and information, that the above statements are true, that I am competent to make this affidavit, and that the above statements were made by drawing from my personal knowledge of the situation.



Anthony Clark

SWORN TO and SUBSCRIBED before me this 14 day of March, 2006.



NOTARY PUBLIC

My Commission Expires: 3/31/09

EXHIBIT B
Affidavit of Kevin Smith

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

AL EVERITT BOYETT, JR.,)
)
Plaintiff,)
)
v.) CIVIL ACTION NO.: 2:05-CV-966-D
)
ANTHONY CLARK, SHERIFF, *et al.*,)
)
Defendants.)

AFFIDAVIT OF KEVIN SMITH

STATE OF ALABAMA)
)
COUNTY OF COVINGTON)

1. My name is Kevin Smith. I am over the age of nineteen and am competent to execute this affidavit, which is based on my personal knowledge, training and experience.

2. I was the interim jail administrator of the Covington County Jail, Covington County, Alabama at the time of the events underlying the Plaintiff's Complaint.

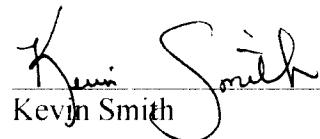
3. I am not a trained health care professional, and have no means of determining what is appropriate medical care for any disease. I rely on Southern Health Care to provide me with sufficient information to provide appropriate and adequate health care to inmates in the jail.

4. To my knowledge, Southern Health Care has not informed me that the Plaintiff in this action requires any particular or specialized treatment or health care.

5. It is the policy of the Covington County Sheriff's Department that inmates who are readily identifiable as having communicable diseases, or who require medical treatment beyond what the Covington County Jail can provide, are transferred as soon as possible into the custody of an Alabama State correctional institution.

6. The Covington County Sheriff's Office has attempted, on many occasions, to transfer inmates to the State, only to have them refused. At any given time, the Covington County Jail currently has approximately fifty (50) State inmates waiting to be accepted by the State Department of Corrections.

12. I affirm, to the best of my present knowledge and information, that the above statements are true, that I am competent to make this affidavit, and that the above statements were made by drawing from my personal knowledge of the situation.



Kevin Smith

SWORN TO and **SUBSCRIBED** before me this 14 day of March, 2006.



Debbie Cook
NOTARY PUBLIC

My Commission Expires: 3/5/09